

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

JOHN A. ZACCARO,

Index No.: 08-CV-3138

Plaintiff,

vs.

HASU P. SHAH, KIRIN P. PATEL, AFFORDABLE  
HOSPITALITY ASSOCIATES, L.P., AFFORDABLE  
HOSPITALITY, INC., HERSHA HOSPITALITY  
TRUST, HERSHA ENTERPRISES, LTD., NISH  
CAPITAL, INC., 3344 ASSOCIATES, LP, JOHN and  
MARY DOES "1" through "10", and DOE  
CORPORATIONS "1" through "10"

Defendants.

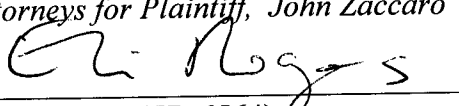
**MOTION TO ADMIT  
MONIKA S. PUNDALIK, ESQ. PR  
HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for  
the Southern and Eastern District of New York, I, Eli J. Rogers Esq., a member in good standing  
of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Monika S. Pundalik, Esq.  
Dreifuss Bonacci & Parker, LLP  
26 Columbia Turnpike, North Entrance  
Florham Park, New Jersey 07932  
(973) 514-1414  
fax (973) 514-5958

Monika S. Pundalik, Esq. is a member in good standing of the Bar of the State of New  
Jersey. There are no pending disciplinary proceeding against Monika S. Pundalik, Esq. in any  
State or Federal court

**DREIFUSS BONACCI & PARKER, LLP**  
*Attorneys for Plaintiff, John Zaccaro*

By:   
Eli J. Rogers (ER-6564)  
One Penn Plaza, 36<sup>th</sup> Floor  
New York, New York 10119  
- and -  
26 Columbia Turnpike, North Entrance  
Florham Park, New Jersey 07932  
(973) 514-1414

Dated: April 7, 2008  
Florham Park, New Jersey

APR 9 2008

912 925-647086

FILED  
U.S. DISTRICT COURT  
2008 APR -9 PM 12:24  
S.D. OF N.Y.

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JOHN A. ZACCARO,

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**AFFIDAVIT OF ELI J. ROGERS  
IN SUPPORT OF MOTION FOR  
PRO HAC VICE ADMISSION OF  
MONIKA S. PUNDALIK, ESQ.**

STATE OF NEW JERSEY :  
: ss.  
COUNTY OF MORRIS :

**ELI J. ROGERS, ESQ.**, of full age, being duly sworn according to law, upon his  
oath, deposes and says:

1. I am an associate of the law firm Dreifuss Bonacci & Parker, LLP,  
attorneys for Plaintiff, John A. Zaccaro ("Zaccaro"). I am familiar with the proceedings  
in this case. I make this statement based on my personal knowledge of the facts set forth  
herein and in support of Plaintiff Zaccaro's motion to admit Monika S. Pundalik as  
counsel pro hac vice to represent Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and  
was admitted to practice law in March 23, 2006. I am also admitted to the bar of the  
United States District Court for the Southern District of New York, and am in good  
standing with this Court.

3. I have known Monika S. Pundalik, Esq. since May, 2004.

4. Monika S. Pundalik, Esq. is an associate at Dreifuss Bonacci & Parker, LLP.

5. I have found Monika S. Pundalik, Esq. to be a skilled attorney and a person of integrity. She is experienced in federal practice and is familiar with the Federal Rules of Procedure.


6. Accordingly, I am pleased to move the admission of Monika S. Pundalik, Esq., pro hac vice.

7. I respectfully submit a proposed order granting the admission of Monika S. Pundalik, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the motion to admit Monika S. Pundalik, Esq. pro hac vice, to present Plaintiff, Zaccaro in the above captioned matter be granted.

  
\_\_\_\_\_  
ELI J. ROGERS, ESQ.

Sworn to and subscribed  
before me on this 7  
day of April, 2008.

  
\_\_\_\_\_  
Notary Public, State of New Jersey

**MARIA ESPOSITO**  
**Notary Public of New Jersey**  
**I.D.# 2247678**  
**Commission Expires 8/23/2012**

**UNITED STATE DISTRICT COURT  
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Index No.: 08-CV-3138

**ORDER FOR ADMISSION OF  
MONIKA S. PUNDALIK, ESQ. PRO  
HAC VICE ON WRITTEN NOTICE**

Upon the motion of Eli J. Rogers, Esq. attorney for Plaintiff, John A. Zaccaro, and  
said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Monika S. Pundalik, Esq.  
Dreifuss Bonacci & Parker, LLP  
26 Columbia Turnpike, North Entrance  
Florham Park, New Jersey 07932  
(973) 514-1414  
fax (973) 514-5958  
mpundalik@dbplawfirm.com

is admitted to practice pro hac vice as counsel for Plaintiff, John A. Zaccaro, in the above  
captioned case in the United State District Court for the Southern District of New York.  
All attorneys appearing before this Court are subject to the Local Rules of this Court,  
including the Rules governing discipline of attorneys. If this action is assigned to the  
Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF  
password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of  
the Court.

\_\_\_\_\_  
Untied State District/Magistrate Judge

Dated: \_\_\_\_\_, 2008  
New York, New York

# Supreme Court of New Jersey

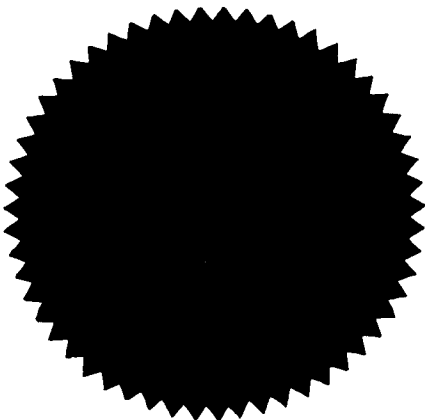


## Certificate of Good Standing

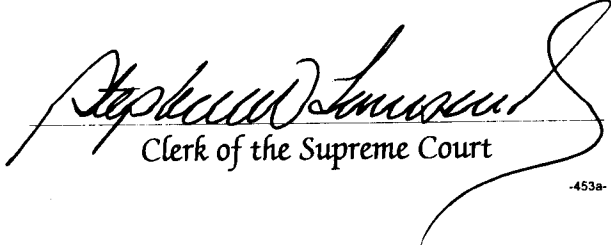
This is to certify that **MONIKA S PUNDALIK**  
(No. **006542003** ) was constituted and appointed an Attorney at Law of New  
Jersey on **June 20, 2003** and, as such,  
has been admitted to practice before the Supreme Court and all other courts of this State  
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in  
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"  
if the Court's records reflect that the attorney: 1) is current with all assessments  
imposed as a part of the filing of the annual Attorney Registration Statement, including,  
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client  
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not  
resigned from the Bar of this State; and 4) has not been transferred to Disability  
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's  
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to  
practice law in this State.*



In testimony whereof, I have  
hereunto set my hand and  
affixed the Seal of the  
Supreme Court, at Trenton, this  
3RD day of April , 20 08

  
Clerk of the Supreme Court

# Certificate of Good Standing



**United States of America**

**District of New Jersey**

*I, WILLIAM T. WALSH, Clerk of the United States District Court for the District of New Jersey, do hereby certify that:*

**Monika S. Pundalik**

*was duly admitted to practice in said Court as of October 1, 2003, and is in good standing as a member of the Bar of said Court.*

*Dated at Newark, New Jersey  
on: April 3, 2008*

**WILLIAM T. WALSH, CLERK**

By

  
Carey P. Carlisle, Deputy Clerk

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK**

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Defendants.

Index No.: 102874/08

**PROOF OF SERVICE**

ELI J. ROGERS, ESQ., affirms under penalty of perjury, as follows:

1. I am an attorney admitted to practice in the State of New York.
2. On this date I caused an original and two copies of the following:
  - a. Notice of Motion for Pro Hac Vice Admission Monika S. Pundalik, Esq.;
  - b. Affirmation of Sponsoring Counsel in Support Of John Zaccaro's Motion For Pro Hac Vice Admission of Monika S. Pundalik, Esq.; and
  - c. Certificates of Good Standing

to be delivered to this Court for filing via Federal Express.

3. On this date I caused hard copies of the aforementioned papers via Federal

Express upon :

Edward A. Fleck, Esq.  
1205 Franklin Avenue  
Suite 300  
Garden City, NY 11530

4. I affirm under penalty of perjury that the foregoing statements made by me are true, except those made upon information and belief, which I believe to be true.

A handwritten signature in black ink, appearing to read "E. Rogers", written over a horizontal line.

Eli J. Rogers, Esq.

Dated: April 7, 2008  
Florham Park, New Jersey